

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

Unisys Corporation,

Plaintiff,

vs.

Leon Gilbert and Michael McGarvey,

Defendants.

Civil Action No. 2:23-CV-00555-PD

JURY TRIAL DEMANDED

**JOINT STIPULATION FOR AN EXTENSION OF TIME FOR DEFENDANTS TO RESPOND
TO UNISYS'S MOTION FOR A TEMPORARY RESTRAINING ORDER**

On February 13, 2023, Unisys Corporation (“Unisys”) filed a complaint alleging claims of trade secret misappropriation and breach of contract against Defendants Leon Gilbert and Michael McGarvey (collectively, “Defendants”) (Dkt. 1). On the same day, Unisys filed a motion for a temporary restraining order, requesting that Defendants be enjoined from misappropriating Unisys’s trade secrets and breaching their contracts with Unisys (Dkt. 4).¹ The Court ordered Defendants to respond to Unisys’s TRO by February 16, 2023 at 5:00 p.m. Dkt. 9.

On February 15, 2023, Defendants, through their counsel, reached out to Unisys and requested an extension until February 20, 2023 at 5:00 p.m. to respond to the TRO. Defendants agreed not to rely on the extension as a defense to the TRO. Defendants’ counsel also agreed to accept service on behalf of Mr. Gilbert and Mr. McGarvey. Unisys does not oppose Defendants’ request for an extension.

Therefore, the parties jointly submit this stipulation, subject to the Court’s approval, for

¹ On February 14, 2023, Unisys requested that minor corrections be made to the complaint, an exhibit to the complaint, and an exhibit to the TRO. The corrected documents were placed on the docket on February 14, 2023. Dkt. 8.

Defendants' time to respond to the TRO to be extended to February 20, 2023 at 5:00 p.m.

DATED: February 16, 2023

Respectfully submitted,

/s/ Julian C. Williams

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Attorneys for Plaintiff
Unisys Corporation

DATED: February 16, 2023

Respectfully submitted,

/s/ Gerald J. Stubenhofer (with permission)
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Attorneys for Defendants

CERTIFICATE OF SERVICE

I do hereby certify that on this date, I caused true and correct copies of the foregoing document to be served on counsel for Defendants via electronic mail.

DATED: February 16, 2023

/s/ Julian C. Williams

Julian C. Williams